

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

KIRK LANCE,

Plaintiff,

vs.

ANCHORAGE LAUNCH SERVICE CO., IN
PERSONAM; M/V TRIUMPH V, OFFICIAL
NUMBER 529680, HER ENGINES,
MACHINERY APPURTENANCES AND
CARGO, IN REM,

Defendants.

IN ADMRALTY

Case No.: 3:22-cv-05075-BJR

**STIPULATED JOINT MOTION TO
EXTEND DEADLINE FOR EXPERT
WITNESS REPORTS AND DISCOVERY
CUTOFF.**

COME NOW the parties, by and through their respective attorneys of record, to move this court as follows:

For an extension of the deadline for reports from expert witnesses under FRCP 26(a)(2), to January 17, 2023. The deadline for the Reports from Expert Witnesses is currently set for September 12, 2022;

For an extension of the deadline to complete discovery to February 14, 2023. The deadline for completion of discovery is currently set for December 15, 2022.

Plaintiff continues to undergo medical treatment related to injuries at issue in this case and has a pre-operation appointment scheduled for September 12, 2022. Surgery is expected to occur the

**STIPULATED JOINT MOTION TO EXTEND DEADLINE FOR EXPERT
WITNESS REPORTS AND DISCOVERY CUTOFF - 1
CASE NO. 3:22-cv-05075-BJR**

John W. Merriam
4005 20th Avenue West, Suite 110
Seattle, WA 98199
T (206) 729-5252 ♦ F (206) 729-1012

1 following week. Recent medical records indicate recovery from the particular surgery could take 6-
2 12 weeks. As a result, significant facts continue to develop, and may continue to develop past the
3 December 15, 2022 discovery cutoff. Discovery relevant to expert witness opinions and reports
4 remains to be conducted and will depend on plaintiff's recovery from surgery. The parties
5 respectfully assert that good cause for extension of the deadlines for reports from expert witnesses'
6 and completion of discovery is present.
7

8
9 Respectfully submitted:

10
11 LAW OFFICE OF JOHN MERRIAM

12 By: /s/John W. Merriam
13 John W. Merriam, WSBA#12749
14 4005 20th Avenue West, Suite 110
15 Seattle, WA 98199
16 Telephone: (206) 729-5252
17 Fax: (206) 729-1012
18 E-mail: john@merriam-maritimelaw.com
19 Attorney for Plaintiff

20
21 BAUER MOYNIHAN & JOHNSON, LLP

22 By: /s/ William P. Jensen
23 William P. Jensen, WSBA#56305
24 Thomas G. Waller, WSBA No. 22963
25 2101 Fourth Avenue, Suite 2400
Seattle, WA 98121
Telephone: (206) 905-3232
Fax: (206) 448-9076
E-mail: wpjensen@bmjlaw.com
Attorney for Defendant Anchorage Launch Service Co. In Personam

ORDER

Based upon the foregoing stipulation of the parties, the deadline for Reports from Expert Witness is extended to January 17, 2023. and the deadline for completion of discovery is extended to February 14, 2023.

Dated this 13th day of September, 2022



BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE